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February 10, 2023

VIA ELECTRONIC MAIL

Y. Gloria Park
Susman Godfrey LLP
301 Avenue of the Americas, 32nd Floor
New York, NY 10019

RE: Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

Dear Attorney Park:

This is in response to your letter of February 6, 2023.

1. Your complaints in paragraph 1. Sorry, there was a typo. We continue to offer Adrian Melendez, Jr., and Petro Industrial Solutions' deposition for April 28, 2023.

Let's be specific, April 28, 2023, is not the first date I offer, it is the first date that all counsel have available.

I didn't suggest a date for Adrian Melendez, Sr. because you wouldn't agree to any deposition dates after the deadlines set by the Court, and, as such, there was no place to put him as you were the only one that wanted that deposition.

2. I did not offer to produce anyone in my last letter, I only suggested dates to schedule depositions. The Court requested we agree on a proposed deposition schedule, and I proposed one. To date, no one else has done so actually using available dates of all counsel.

February 10, 2023
Page 2

3. I did not agree to produce Elias Rivera, I only suggested a date for his deposition. If you don't like the date of June 20, 2023, then please propose your own schedule using the dates all counsel have available. Please do not invent new dates because those would be dates when all counsel would not be available. Your suggestion of May 24, 2023, is a date that Attorney Simone Francis only has the morning available, and there are already two depositions scheduled. June 14, 2023, is likewise already scheduled. Again, feel free to shuffle and propose a different schedule for the dates and depositions, as long as you use the same dates as mine, which are the only dates all counsel have available.

4. I will check with my client about Frank Kirsch. However, because you will not agree to go past the Court deadline, he is currently not on the proposed schedule.

Vitol's Witnesses

May 19, 2023, you have confirmed Charlotte Horowitz and Vitol VI for that date. I have just been scheduled for a medical procedure in Jacksonville, Florida, for that date. I am trying to move it, and may have to move those depositions to May 22, 2023. Please let me know if that can be an alternate date.

Sebastian Merretti: You cannot suggest him for the morning, as Attorney Simone Francis is currently not available in the morning. Please stop this nonsense. If Attorney Simone Francis is available in the morning, I would be glad to depose him then. Please let me know, as soon as you can, so that we can tie down this schedule in accordance with the Court's directives.

I have added a 30(b)(6) of Vitol Virgin Islands for the same day as Tom Kologinczak, in case he will also be a 30(b)(6) witness.

Third-party Witnesses

Again, you seem to misunderstand my letters. They do not contain just depositions Plaintiff wants to take. I added all the depositions everyone wanted to take, in order to come up with a group-proposed deposition schedule. You had depositions on your list of companies through a specific person for Versa Integrity Group, Acuren Inspection Services, etc., but someone else wanted 30(b)(6). It seemed to be the most efficient way to obtain the information you would want, was to just list the depositions as 30(b)(6).

As scheduled, this as much as I could get scheduled on the time allotted. Given your position of no extension, there was nowhere to put Saintnals LLC and again, you were the only party that had that deposition on its list.

February 10, 2023
Page 3

Again, your suggestion to not place the non-party witnesses on the deposition schedule is not helpful, as we were ordered to come up with a proposed deposition schedule. It would appear that if the parties wanting those depositions got their 30(b)(6) notices and subpoenas out promptly, they would be available to attend in June.

As to the rest of the Defendants, I have received no feedback on the proposed deposition schedule, their client's availability, or the witnesses they intend to produce. We were to have met and conferred by February 3, 2023, and filed a final proposed schedule by February 10, 2023. It is February 10, 2023, and I have not heard back from the non-Vitol Defendants. I need to hear from you today.

For you, ease of reference, the proposed schedule is set out below again.

Date:	Deponent:
April 28, 2023	Petro Industrial Solutions, LLC, and Adrian Melendez, Sr.
May 19, 2023	Charlotte Horowitz, and 30(b)(6) Vitol Virgin Islands
May 22, 2023	Rawle Granger and Chetram Persaud
May 23, 2023	Tom Kologinczak, 30(b)(6) Vitol Virgin Islands Corp.
May 24, 2023, morning	Garry Stoker and Andreas Constantinou
May 25, 2023, afternoon	Sebastian Merretti and Terrence Keogh
June 14, 2023	30(b)(6) Versa Integrity and Acuren Inspection Services
June 15, 2023	30(b)(6) Vitol US Holdings II, Co.
June 16, 2023	Andrew Canning and 30(b)(6) OPTIS Europe, Ltd.
June 19, 2023, afternoon	30(b)(6) Traeger Brothers
June 20, 2023	Elias Rivera and Coury Hodge
June 21, 2023	David Smith and IPOS
June 22, 2023	Martin Figueira and IPOS

Cordially,



Lee J. Rohn, Esq.

LJR/kj

cc: Carl A. Beckstedt, III, Esq.
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Simone Francis, Esq.
Andrew Simpson, Esq.